



Order Filed on April 7, 2020  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

CXE 19-025222

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ATTORNEYS FOR NATIONSTAR MORTGAGE

LLC D/B/A MR. COOPER

IN RE:

THOMAS A. THRESS AND ASHLEY M. THRESS  
A/K/A ASHLEY M. TITUS, DEBTORS

CASE NO.: 15-30823-ABA


JUDGE: HONORABLE ANDREW B.  
ALTENBURG, JR.

CHAPTER: 13

**CONSENT ORDER RESOLVING MOTION TO VACATE STAY**

The relief set forth on the following pages, numbered two (2) through two (2) is hereby ORDERED.

**DATED: April 7, 2020**

  
\_\_\_\_\_  
Honorable Andrew B. Altenburg, Jr.  
United States Bankruptcy Court

This matter being opened to the Court by Shapiro & DeNardo, LLC, Attorneys for Nationstar Mortgage LLC d/b/a Mr. Cooper, hereinafter "Secured Creditor", upon the filing of a Notice of Motion for an Order Vacating Stay in a Chapter 13 Case for failure of the Debtors to make post-petition payments on a mortgage obligation and due notice of said Motion and the supporting Certification having been given by mail to the Trustee, the Debtors and the attorney for the Debtors, if any AND CONSENT OF THE PARTIES APPEARING HEREON and for good cause shown,

1. Debtors are currently delinquent in post-petition payments to Secured Creditor for the months of February 1, 2020 through March 1, 2020 in the total amount of \$2,604.54, less a suspense of \$1,129.25, for a total post-petition arrearage of \$1,475.29.
2. To cure the delinquency outlined in paragraph one (1), debtor agrees to remit to Secured Creditor a monthly cure payment in the amount of \$737.66 for the month of April 1, 2020 and one (1) final cure payment of \$737.63 for the month of May 1, 2020.
3. Starting April 1, 2020, Debtor also agrees to maintain all contractually due payments to Secured Creditor, which currently amount to \$1,302.27.
4. Payments should be submitted to the Secured Creditor via Certified Check to the below address:  

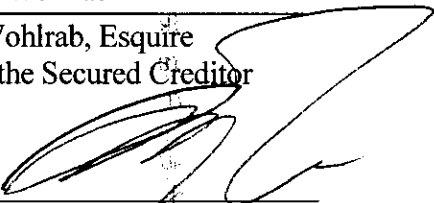
Nationstar Mortgage, LLC dba Mr. Cooper  
PO Box 619094  
Dallas, TX 75261-9741
5. Debtors shall reimburse Secured Creditor \$500.00 in attorney fees and \$181.00 in court costs through the remaining Chapter 13 Plan. The Trustee shall amend his/her records to reflect same.
6. If the Debtor(s) fails to make any payments detailed in this Consent Order within thirty (30) days of the date the payments are due, or if any of the funds paid fail to clear for insufficient funds or are dishonored for any reason, then the Secured Creditor may send Debtor and Debtor's Counsel a written notice of default of this Consent Order. If the default is not cured within ten (10) days of such notice, Mortgagee may obtain an Order Vacating the Automatic Stay as to the Collateral by submitting a Certification of Default to the Bankruptcy Court, specifying the Debtor(s) failure to comply with this Consent Order, with a copy of any application, supporting certification, and proposed Order to be served on the Chapter 13 Standing Trustee, Debtor(s) Counsel and Debtor(s) as required by the local bankruptcy rules.

We hereby consent to the form, content,  
and entry of the within Order.

Shapiro & DeNardo, LLC

/s/ Charles G. Wohlrab

Charles G. Wohlrab, Esquire  
Attorney for the Secured Creditor



Steven N. Taieb, Esquire  
Attorney for the Debtors

Date: 04/07/2020

Date: 4/7/20